BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

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IN THE MATTER OF:

AMENDMENT OF PART 97 OF THE COMMISSION'S RULES CONCERNING MESSAGE FORWARDING SYSTEMS IN THE AMATEUR SERVICE.

PR DOCKET Nº 93-85 MAIL BRANCH

RM-7669, RM-7681, 1

/RM-7675

COMMENTS OF LEE SUTHERLAND PARR

I AM AN AMATEUR ADVANCED CLASS OPERATOR (WARFNJ) OF LONG STANDING AS WELL AS A HOLDER OF A COMMISSION GENERAL RADIO TELEPHONE LICENSE (THE FORMER RADIOTELEPHONE FIRST CLASS).

THE COMMISSION'S PROPOSAL IN THIS MATTER SHOWS THE RIGHT SPIRIT BUT IT FAILS TO RECOGNIZE WHAT IT ACKNOWLEDGES IN PARAGRAPH SEVEN OF THE NOTICE. THAT THIS IS AN AUTOMATIC AND HIGH SPEED SYSTEM. HUMAN INTERVENTION NOT ONLY SLOWS DOWN THE OPERATION, IT ALSO INTRODUCES A GREATER CHANCE OF ERROR OR FAILURE IN THE PASSAGE OF THE TRAFFIC.

ONCE-UPON-A-TIME HUMAN OPERATORS COPIED AND RELAYED MESSAGES BY HAND. THE OPERATOR WOULD COPY THE ENTIRE MESSAGE AND THEN HE WOULD DECIDE HOW DEST TO FORWARD IT. THEN HE WOULD RETRANSMIT IT BY HAND IN ITS ENTIRETY. Now. IN THE MODERN "PACKET" SYSTEM MESSAGES ARE TRANSMITTED NOT IN THEIR ENTIRETY BUT IN SMALL PACKETS. EACH LINE OF THIS PAPER WOULD BE TRANSMITTED SEPERATELY, LINE-BY-LINE. WE WOULD SEND SOME SIXTY PACKETS TO MAKE UP THIS PAGE (TVEN THE PAGE NUMBER AT THE BOTTOM OF THE PAGE WOULD HAVE ITS OWN "PACKET"). EACH OF THESE ONE LINE PACKETS (A PACKET MAY NOT BE MORE THAN 128 CHARACTERS IN LENGTH) WOULD BE INTERLEAVED WITH THE PACKETS OF OTHER MESSAGES AS IT TRAVELS ALONG THE TRANSMISSION PATH. THE ADDRESS AND SENDENCE STATION INFORMATION IN THE "HEADER" OF EACH PACKET ALLOWS REASSEMBLY AT THE ADDRESSED STATION.

JUST TO MAKE LIFE MORE INTERESTING THE PACKET REPEATER OR "DIGIDEATER" DOES NOT WAIT FOR THE ENTIRE MESSAGE BEFORE CETRANSMITTING THE INDIVIDUAL PACRET. AS SOOMAD A PACKET IS CORRECTLY RECEIVED A DECISION IS MADE. ? TO RETRANSMIT THE PACKET ON THAT CHANNEL OR SOME OTHER CHANNEL (LOCAL NETS WILL FREQUENTLY OPERATE IN THE 145 MHz. BAND WHILE "BACKBONE" LONG DISTANCE ROUTE WILL FREQUENTLY BE FOUND ON THE 220 AND 440 MHz. BANDS). THUS, A SUBSTANTIAL PORTION OF THE MESSAGE MAY HAVE BEEN TRANSMITTED BEFORE THE REPEATER OPERATOR HAS ANY POSSIBILITY OF DETERMINING THE FULL IMPORT OF THE MESSAGE. AND, THE SYSTEM IS STRUCTURED TO DEPEND UPON THE PROMPT (INSTANT, EVEN!) RETRANSMISSION OF THE RECEIVED PACKET; FOR IF THE ORIGINATING STATION DOES NOT RECEIVE AN ACKNOWLEDGEMENT OF CORRECT RECEIPT FROM THE DESTINATION STATION WITHIN A FEW SECONDS IT WILL RETRANSMIT THE PACKET OVER-AND-OVER AGAIN UNTIL IT DOES RECEIVE THE ACKNOWLEDGMENT OF CORRECT RECEIPT. IF YOU WATCH THE TRAFFIC PASSING THROUGH A REPEATER YOU WILL SEE ONE LINE OF A MESSAGE REPEATED SEVERAL TIMES INTERSPERSED WITH ASSORTED LINES OF OTHER MESSAGES AND "OVERHEAD" TRAFFIC SUCH AS THE ACKNOWLEDGEMENTS BEING RETURNED TO THE ORIGINATING STATION.

THE ORIGINATING STATION EXPECTS TO SEE THE ACKNOWLEDGMENT FROM THE ADDRESSED STATION WITHIN A VERY FEW SECONDS. WHILE IT IS EASY TO SORT OUT THE MESSAGES AFTER TYPEYENTIRE MESSAGE HAS BEEN PASSED ALONG SORTING THEM OUT "ON-THE-FLY" IS ANOTHER MATTER INDEED.

IN PARAGRAPH FOUR THE NOTICE SPEAKS OF A "MESSAGE-BY-MESSAGE SCREENING PROCEDURE". THE PROBLEM IS THAT THE CURRENT HIGH SPEED PACKET TRANSMISSION IS NOT "MESSAGE-BY-MESSAGE" BUT RATHER PACKET-BY-PACKET ---EACH PACKET BEING BUT ONE LINE (MAXIMUM 128 CHARACTERS) OF THE MESSAGE. AND, TO MAKE THE GRUEL THICKER, THESE INDIVIDUAL LINES WILL BE INTERSPERSED WITH THOSE OF OTHER MESSAGES TRAVELING ALONG THE SAME RADIO PATH (WE DEPEND UPON THE ADDRESS "HEADER" OF EACH PACKET TO SORT THEM OUT AT DESTINATION. WHAT THIS ALL MEANS IS THAT TRYING TO REVIEW MESSAGES IN TRANSIT (ESPECIALLY WITHOUT DELAY) IS A CHORE. AND, A CHORE WITH NO PRACTICAL RETURN.

I AM AWARE THAT LAW SCHOOL TEACHES THAT NO HARM MAY BE PERMITTED, NO MATTER HOW MUCH GOOD MUST BE SUPPRESSED TO PREVENT THAT HARM. BUT, IS THAT"HARM" ---THE TRANSMISSION OF MESSAGES THAT DO NOT COMPLY WITH THE NON-COMMERCIAL RESTRICTIONS OF SECTION 97.113--- SO GREAT THAT WE MUST REQUIRE HUMAN PARTICIPATION IN WHAT IS BASICALLY AN AUTOMATIC SYSTEM DESIGNED TO WORK (AND WORK BEST) WITHOUT INTERVENTION.

Yes, I know that it offends to allow of the possibility that an improper message will be transmitted and repeated (and some will be). But that, I believe, is the chance that we must take if we wish to have a truly fast and automatic and dependable digital traffic handling system. And, unlike most radio operation each and every packet contains the identification of the originating and destination stations. This makes it easy to go to the person who is truly guilty and confront him. In some cases it will make it possible for digipeater operators to deny access to known frequent offenders.

WHAT ALL OF THE ABOVE AMOUNTS TO IS THIS: ANY HUMAN CHECKING OF

